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Liaison Counsel

[Additional counsel appear on signature page.]

IT IS SO ORDERED this **19th** day of
December 2023.

s/ Zahid N. Quraishi
ZAHID N. QURAISHI
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

JOHN KELK, Individually and on)	No. 3:23-cv-03996-ZNQ-DEA
Behalf of All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
)	JOINT STIPULATION AND
vs.)	CONSENT ORDER EXTENDING
)	DEADLINES FOR SERVING
BAUSCH HEALTH COMPANIES)	AMENDED COMPLAINT AND
INC., et al.,)	MOTION TO DISMISS
)	
Defendants.)	
_____)	

Lead Plaintiffs R. Cassian Anderson and Donna S. Preves (“Lead Plaintiffs”) and Defendants Bausch Health Companies Inc., Joseph Papa, Paul Herendeen, and Thomas Appio (“Defendants,” together with Lead Plaintiffs, the “Parties”), by and through their undersigned counsel of record, respectfully submit this stipulation to extend the deadlines for the service of Lead Plaintiff’s amended complaint, Defendants’ motion to dismiss, Lead Plaintiffs’ opposition to Defendants’ motion to dismiss, and Defendants’ reply in further support of their motion to dismiss and state as follows:

WHEREAS, on November 7, 2023, the Parties filed their Joint Stipulation and [Proposed] Scheduling Order (ECF No. 17);

WHEREAS, on November 8, 2023, the Court entered an Order (ECF No. 18) approving the Joint Stipulation, and requiring, *inter alia*, Lead Plaintiffs to serve on Defendants their amended complaint on or before December 22, 2023;

WHEREAS, the partner at Robbins Geller Rudman & Dowd LLP who is overseeing this case on behalf of Lead Plaintiffs has experienced a medical condition which caused him to be out of the office for most of the past month and has greatly limited his ability to work during that time; and

WHEREAS, in light of this, the Parties have met and conferred and agreed, subject to Court approval, to extend the deadline for serving the amended complaint and Defendants’ motion to dismiss.

THEREFORE, the Parties jointly stipulate, subject to approval of the Court, as follows:

1. On or before January 19, 2024, Lead Plaintiffs shall serve on Defendants their amended complaint.
2. On or before March 20, 2024, Defendants shall serve on Lead Plaintiffs any motion to dismiss the amended complaint.
3. On or before May 22, 2024, Lead Plaintiffs shall serve on Defendants their opposition to Defendants' motion to dismiss the amended complaint.
4. On or before July 9, 2024, Defendants shall serve on Lead Plaintiffs their reply in further support of Defendants' motion to dismiss the amended complaint.

IT IS SO STIPULATED.

DATED: December 11, 2023

SEEGER WEISS LLP
CHRISTOPHER A. SEEGER
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s/ Christopher A. Seeger

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